

EXHIBIT B

From: [Hoernlein, Michael](#)
To: [Eckstein, Maya](#); [Francisco, Michael](#); [Moran, John S.](#); [Tagert, Stephen](#); [Rick Boyer](#); [Brooks, Tyler](#); [Yerushalmi, David](#); [Davison, Tom](#); [Van Winter, Samantha](#)
Cc: [Powell, Lewis](#); [Elliker, Kevin](#); [Ruival, Carley](#); [Sehla Ashai](#); [Damon.Porter@lw.com](#); [Ehson.Kashfipour@lw.com](#); [Connelly, Blair](#); [Rowen, Zachary](#); [Wyer, Kathryn \(CIV\)](#)
Subject: RE: Doe v. Mast (WDVA) -- K Motley deposition notice
Date: Tuesday, April 30, 2024 2:03:23 PM

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Thanks, Maya. We're holding that date. As you know, Ms. Motley hasn't filed an answer yet, and we'll oppose any effort to depose her a second time.

Have you provided possible dates for your clients' depositions? Apologies if I missed them. I know we'll have to coordinate with the other parties.

Thanks,
Mike

Michael R. Hoernlein
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From: Eckstein, Maya <meckstein@hunton.com>

Sent: Tuesday, April 30, 2024 1:39 PM

To: Francisco, Michael <MFrancisco@mcguirewoods.com>; Moran, John S. <JMoran@mcguirewoods.com>; Tagert, Stephen <stagert@mcguirewoods.com>; Rick Boyer <rickboyerlaw@gmail.com>; Brooks, Tyler <btb@btylerbrookslawyer.com>; Yerushalmi, David <dyerushalmi@americanfreedomlawcenter.org>; Davison, Tom <Tom.Davison@alston.com>; Hoernlein, Michael <Michael.Hoernlein@alston.com>; Van Winter, Samantha <Samantha.VanWinter@alston.com>

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EXTERNAL SENDER – Proceed with caution

Counsel, please see attached.

Maya



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